BEFORE THE POSTAL RATE COMMISSION

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DOCKET NO. R2000-1

NOTICE BY UNITED PARCEL SERVICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION OF UNITED STATES POSTAL SERVICE WITNESS HUNTER (USPS-T-5) (April 6, 2000)

Pursuant to Section 30(e)(3) of the Commission's Rules of Practice, United Parcel Service ("UPS") hereby gives notice that it intends to conduct oral cross-examination of United States Postal Service witness Hunter on the following subjects: the decision to use PERMIT system and mailing statement/BRPW data to estimate Parcel Post revenue, pieces, and weight (USPS-T-5 at 1-2); how PERMIT system and mailing statement/BRPW data is collected (USPS-T-5 at 2-4); the Postal Service's procedures for verifying the accuracy of PERMIT system and mailing statement information (USPS-T-5 at 2-5); how the Postal Service processes and checks PERMIT system and mailing statement data both before, as, and after it is entered into the BRPW estimation system (USPS-T-5 at 2-4); data anomalies in the data set used by Mr. Hunter to develop BRPW estimates for Parcel Post (USPS-T-5 at 2-4); the relationship between the DRPW and BRPW systems in estimating Parcel Post revenue, pieces, and weight (USPS-T-5 at 2-5); revenue adjustments and conversions from PFY to GFY estimates (USPS-T-5 at 4-5); steps taken to insure that pieces sampled in the

DRPW system are not also counted in the BRPW system (USPS-T-5 at 2); and clarification of and expansion on Mr. Hunter's interrogatory responses.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

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Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Philip E. Wilson, Jr.

Attorney for United Parcel Service

Dated: April 6, 2000 Philadelphia, Pa.

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